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June 21, 2012

By: Electronic Filing

Hon. Michael A. Shipp
United States District Court
District of New Jersey
Martin Luther King Building
50 Walnut Street, Room 4015
Newark, New Jersey 07101

Re: *Sperry Associates Federal Credit Union*
v.
CUMIS Insurance Society, Inc.
Civil Case No. 10-00029

Dear Judge Shipp:

As Your Honor is aware, this office represents Plaintiff, Sperry Associates Federal Credit Union ("Sperry") in the above captioned matter. I am writing to you regarding Sperry's opposition to CUMIS Insurance Society's ("CUMIS") motion to compel production.

Pursuant to the Your Honor's order motions to compel and for protective orders were to be filed by June 8, 2012, with opposition to be filed by June 18, 2012. This office mis-calendared the date to file opposition for June 22, 2012, and only realized the same when preparing to file the opposition on June 21, 2012. Counsel emailed CUMIS to obtain consent to file late but received no response and attempted to reach CUMIS by phone. Counsel also contacted your Judicial Clerk and advised of the situation and was advised to file with a letter requesting leave to file late. Accordingly, it is respectfully requested that Sperry be granted leave to file its opposition to CUMIS' motion after the date scheduled by Your Honor.

I thank you for your consideration of this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Kenneth J. Pagliughi". The signature is fluid and cursive, with the first name "Kenneth" and last name "Pagliughi" clearly distinguishable.

Kenneth J. Pagliughi
Scott A. Rosenberg, PC

cc: Counsel of Record by Electronic Filing